

Winston E. Calvert

Direct T 314.259.4752 F 314.552.4883

wcalvert@armstrongteasdale.com

US EPA RECORDS CENTER REGION 5



461902

MISSOURI KANSAS ILLINOIS NEVADA SHANGHAI

March 4, 2013

Michelle Kerr, Remedial Project Manager  
U.S. Environmental Protection Agency  
Superfund Division  
77 W. Jackson Blvd., SR-6J  
Chicago, IL 60604

**Re: Response to Follow-Up Request for Information / Chemetco Superfund Site in  
Hartford, Illinois**

Dear Ms. Kerr:

As you know, this firm represents Totall Metal Recycling, Inc. ("Totall") relating to the Chemetco Site. Enclosed please find Totall's response to the Follow-Up Request for Information we received less than thirty days ago. Please let me know if you require additional information.

Best regards,

A handwritten signature in black ink, appearing to read "Winston Calvert", with a stylized, flowing script.

Winston E. Calvert

## **TOTALL'S RESPONSE TO SUPPLEMENTAL INFORMATION REQUEST**

1. Describe in detail the types of materials that you processed for Chemetco, as they arrived at your facility, their industrial sources, functions, etc. In your response, please also give the generic or common name of each type of material.

- (a) Your initial response included a list of material types received from Chemetco for processing. Please describe any changes or updates to this list and corresponding date(s) of those updates and provide those changes.

**Response:** N/A

- (b) State whether any of the material you received from Chemetco, or any residue or byproduct created via processing of that material by you, was ever tested by your company and if so, whether the material, residue or byproduct exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code (IAC) 721, Subpart C or 40 C.F.R. § 261, Subpart C.

**Response:** N/A. All by-products were characterized by knowledge of the waste stream and landfill requirements.

- (c) Describe what was done to materials once they were brought to the Site, including how the materials were shipped to and handled at the Site, and as well as all further processing of the materials.

**Response:** Transformit's only client was Chemetco. All the material processed by Transformit was owned by Chemetco. Most of the material came from one of Chemetco's warehouses, although on occasion Chemetco would arrange for their customer to ship the material purchased by Chemetco directly to Transformit. There were only two categories of material sent to Transformit by Chemetco: various sizes of copper wire with a plastic coating and aluminum/copper radiators. Transformit would chop the wire into small pieces at which time the plastic could be separated from the wire. The plastic was non-hazardous and was sent to the Milan Landfill for disposal in compliance with the Landfill's specifications. The radiators were chopped into smaller pieces so that the aluminum and the copper could be extracted. The residual material from this process was also sent to Milan Landfill in accordance with their specifications. Chemetco would arrange for the shipment of the copper and aluminum to its facility. On occasion Transformit would receive non-conforming material not suitable for its process. Transformit would stage this material in their original containers and Chemetco would retrieve this material when Chemetco picked up the processed material.

- (d) Provide any additional information and all documents that you believe are related to the type, nature and characteristics of the materials you handled for Chemetco.

**Response:** N/A

2. Describe the types of insulation on each type of wire you processed for Chemetco.

**Response:** See answer to #1(c).

3. Did the material processed for Chemetco include drums, shipping containers, or other transport containers? If so, specify the generators of the drums or shipping/transport containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.

**Response:** Much of the material described in 1(c) came in steel drums. Transformit would shred the drums and ship the shredded material to Chemetco. On occasions where the packaging was made of paper or similar packaging material, it would be sent to a landfill for disposal. Any barrel containing liquids would be considered non-conforming and be handled as set out in 1(c).

4. Documentation provided in your initial response to EPA's Information Request indicated barrels from Chemetco were processed. Describe this aspect of your operation. How did Transformit process barrels? Did the barrels ever contain liquid or waste of any sort? If so, specify the type of liquid or wastes of any kind.

**Response:** See answer to #3.

5. For each material type handled and/or processed for Chemetco at any time, what quantity was processed annually for the duration of your relationship with Chemetco?

**Response:** We have previously provided documents that contain our best information regarding volumes.

6. What were the processing specifications or requirements that Chemetco gave to Transformit/Total/Pioneer Warehouses, Inc. for materials sent by Chemetco? Include any and all versions of such specifications.

**Response:** Transformit was required to provide Chemetco "#2 chops" which was 95% copper.

7. Describe precisely how you handled each type of material Chemetco sent to your facility for processing.

**Response:** Transformit's equipment would chop the material into small pieces, making separation of the metal possible.

8. Describe each technique you used to separate each type of insulation from wire and cable for Chemetco. How was the stripped or otherwise separated insulation handled at your facility, and how was it ultimately used, further processed, recycled, and/or disposed? Was wire insulation ever sent back to Chemetco? For what purpose? Describe specifically what and how much Chemetco took back after the material was processed.

**Response:** See answer to #1(c).

9. Describe each technique you used to process circuit boards or their components (e.g. circuit board trim) for Chemetco. How was the material handled at your facility, and how was it ultimately used, further processed, recycled, and/or disposed? Was the byproduct ever sent back to Chemetco? For what purpose? Describe specifically what and how much Chemetco took back after the material was processed.

**Response:** N/A

10. Did you ever process computer equipment or their components for Chemetco? If so, describe each technique you used to process computer equipment or any of its components (e.g. keyboards, monitors, hard drives, power supplies, breakage, printers, etc.) for Chemetco. How was the material handled at your facility, and how was it ultimately used, further processed, recycled, and/or disposed? Was the byproduct ever sent back to Chemetco? For what purpose? Describe specifically what and how much Chemetco took back after the material was processed.

**Response:** N/A

11. For each material you processed for Chemetco,

- (a) What byproducts or materials resulted the from processing of each type of material processed?

**Response:** See answer to 1(c).

- (b) How was that byproduct or material handled at your facility, and ultimately used, further processed, recycled, and/or disposed? Please provide any disposal records, including where disposal took place.

**Response:** See answer to 1(c).

- (c) Were all byproducts or materials that were not sent back to Chemetco after processing by Transformit disposed of, or was there some other use or disposition of the byproduct materials? If so, please describe.

**Response:** See answer to 1(c).

- (d) After processing, were byproduct or materials ever returned to Chemetco? If so, please describe.

**Response:** See answer to 1(c).

12. Describe the quality control and/or quality assurance (QA/QC) measures you had in place to meet Chemetco's specifications and requirements. Did your company have its own QA/QC criteria for processing each or any of Chemetco's materials? If so, describe.

**Response:** The #2 chops standard was assessed visually by the parties.

13. Did any of the material you processed for Chemetco contain other material(s) incident to or adhering to the scrap after processing? If so, describe in detail.

**Response:** No

14. Did a supplier to Chemetco ever send materials directly to you for processing prior to sending to Chemetco? If so, which supplier(s)?

**Response:** Chemetco would sometimes arrange for transport directly from its customer to Transformat. We do not have records that identify customers of Chemetco.

15. Did you ever send materials to Chemetco for recycling on behalf of your own or other customers?

**Response:** No

16. Did you ever send residues or byproducts from your processing operation to Chemetco for recycling?

**Response:** No

17. The copy of the materials processing contract between Pioneer Warehouses Inc. and Chemetco is dated 1998. Your response to questions 4 and 25 indicate a different year, as does one of the income statements you provided. Please clarify and list the years in which your company processed materials for Chemetco and/or its broker(s) for recycling, processing, sale, or disposal, with or without contract.

**Response:**

The undersigned started working for Transformat in 1997 and there was very little business activity at that time. The relationship between Chemetco and Transformat preceded my arrival but I do not have any information pre-1997.

18. Was any batch or load of material processed by you ever refused and/or returned by Chemetco? If so, describe this event(s) in detail, including its cause and outcome.

**Response:** Yes. We do not have any specific recollection of this but we believe some material was returned for further processing.

19. Provide copies of all documents and correspondence between you and Chemetco that relates to your relationship, processing of Chemetco materials, measures you took to determine the actual means of handling and recycling of materials at Chemetco, investigation of the nature of the operations at the Chemetco site, and Chemetco's environmental compliance.

**Response:** A good faith search has not identified further documents.

20. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials,

particularly Section 127 of CERCLA, 42 U.S.C. § 9627, processed for the Chemetco Site. Under CERCLA, you may not withhold such information on the basis that it is confidential; but you may ask EPA to treat the information as confidential.

**Response:** Transformit maintained an air permit and from time to time Transformit was inspected by IEPA.

21. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding scrap metal promulgated under the Resource Conservation and Recovery Act (RCRA). Under CERCLA, you may not withhold such information on the basis that it is confidential; but you may ask EPA to treat the information as confidential.

**Response:** See answer to #20.

22. Provide all information in your possession that shows the price Chemetco paid or was paid for each of the materials processed by you.

**Response:** Documents previously provided contain all the information in our possession regarding pricing.

23. Provide any additional responsive documents to EPA's original Information Request discovered as Total continued its search since May 2012.

**Response:** N/A

**VERIFICATION**

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

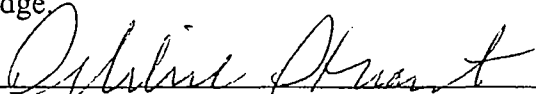
  
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Tobe Suarez

ST. LOUIS COUNTY        )  
                                  )   SS  
STATE OF MISSOURI     )

Tobe Suarez, of lawful age, and being duly sworn on his oath, states that the foregoing response and the facts contained therein are true and correct to the best of his knowledge, information and belief.

  
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Tobe Suarez

On this 15<sup>th</sup> day of March, 2013, before me appeared Tobe Suarez, who being duly sworn on his oath, stated that the foregoing response and the facts stated therein were true and correct to the best of his personal knowledge.

  
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Notary Public

My Commission Expires:

8-16-15

